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August 11, 2026

Ms. Yana Garcia
Secretary for Environmental Protection
California Environmental Protection Agency
1001 I Street
Sacramento, California 95814

Subject: Preliminary Designation of Disadvantaged Communities – July 2026

Dear Secretary Garcia:

On behalf of the Board of Supervisors of the County of San Luis Obispo (County), I write to respectfully request that CalEPA exercise its authority under Health and Safety Code section 39711(a)¹ to add the following census tracts to the Final 2026 SB 535 Disadvantaged Communities (DAC) Designation:

- 122.01 and 122.02, Oceano;
- 100.16, San Miguel;
- 103.01 and 103.03, Shandon;
- 124.03–124.06, inclusive, Nipomo town and surrounding area; and
- 123.06, Nipomo Mesa.

Section 39711(a) directs CalEPA to identify disadvantaged communities based on geographic, socioeconomic, public health, and environmental hazard criteria and provides that the factors supporting designation are not limited to those specifically identified in the statute. CalEPA's Preliminary 2026 Designation recognizes that the agency has broad discretion in developing and applying these criteria. The statute does not require CalEPA to limit designation to the highest 25 percent of CalEnviroScreen 5.0 overall scores, and CalEPA acknowledges that the 25-percent threshold is a policy determination rather than a statutory limit.²

¹ Cal. Health & Safety Code § 39711(a). [California Legislative Information](#)

² California Environmental Protection Agency, *Preliminary 2026 Designation of Disadvantaged Communities Pursuant to Senate Bill 535* (July 2026), pp. 1, 7–8. CalEPA states that it has “broad discretion for developing specific criteria and methods for applying those criteria” and explains that SB 535 does not specify how many

The County believes the record supports exercising that discretion here. These rural and agricultural communities present a combination of socioeconomic vulnerability and documented environmental burden that is not fully reflected by their CalEnviroScreen 5.0 overall scores. Large rural census tracts, uncertainty in survey estimates, and differences between census geography and the actual location of the disadvantaged population can make identification of concentrated disadvantage difficult through statistical extrapolation of samples and tract-wide averages alone. We respectfully request that CalEPA consider and act on the additional evidence below in updating the preliminary 2026 DAC designations.

Census and ACS Data Limitations

The American Community Survey (ACS) provides important tract-level socioeconomic information and should remain a key factor in a comparative statewide analysis. At the same time, estimates for smaller rural populations in that dataset relevant to these identified tracts have substantial margins of error.³ The resulting uncertainty is particularly relevant where a tract combines a populated community with agricultural land, small towns, and sparsely populated areas.

There are additional survey count concerns relevant to agricultural communities. San Luis Obispo County has seasonal and migrant agricultural workers, households experiencing overcrowding or housing instability, and non-English-speaking residents, including speakers of Mixteco, Zapoteco, and other Indigenous languages. Population mobility, informal housing arrangements, and language barriers can make household survey estimates less precise for some populations. These factors provide a tangible reason to consider additional reliable local data when those sources indicate materially different socioeconomic conditions from those reflected in tract-level survey estimates.⁴

communities or what percentage must be designated; CalEPA selected the 25-percent threshold as a policy approach. [CalEPA Preliminary 2026 Designation](#)

³ U.S. Census Bureau, *American Community Survey 2020–2024 5-Year Estimates*, including Table S0701 for the identified census tracts; U.S. Census Bureau, *American Community Survey and Puerto Rico Community Survey Design and Methodology*, Version 4.0 (2024). See also U.S. Census Bureau, *Understanding and Using American Community Survey Data: What All Data Users Need to Know*, ch. 7 (explaining margins of error and reliability of estimates for small geographic areas). [ACS Table S0701](#); [ACS Design and Methodology](#); [Census Bureau ACS Error Guidance](#)

⁴ Joel Diringer, *The Fabric of SLO County: Understanding the Diversity and Contributions of Our Immigrant Community*, Community Foundation San Luis Obispo County (Jan. 2025); Mario Alberto Viveros Espinoza-Kulick et al., *San Luis Obispo County Mexican Indigenous Community Study: Report of Findings* (Apr. 2024). [SLO County Immigrant Study](#); [SLOMICS Report](#)

School Site Data Demonstrating Concentration of Disadvantage

California school administrative data provide independent evidence of relative disadvantage. The California Department of Education (CDE) and CALPADS data for schools associated with Oceano, San Miguel, Shandon, and the older Nipomo town area (“Olde Towne Nipomo”) show substantial concentrations of socioeconomically disadvantaged students and, in several instances, English learners and students experiencing homelessness. Unlike ACS estimates, these are annually updated administrative records based on all enrolled students.⁵

School status under Title I of the federal Elementary and Secondary Education Act of 1965 provides an additional indicator of the approximate geography of socioeconomic disadvantage. CDE's FY 2025–26 records identify Oceano Elementary, Nipomo Elementary, Lillian Larsen Elementary in San Miguel, and Shandon Elementary as Title I schools.⁶ While school attendance areas do not correspond precisely with census tract boundaries, Title I status also provides independent evidence of socioeconomic disadvantage among children and families in the communities associated with the census tracts identified.

Community-Specific Considerations

Census Tracts 122.01 and 122.02. Oceano is a distinct residential community within the Lucia Mar Unified School District. School administrative records indicate substantial socioeconomic disadvantage, English learner enrollment, and student homelessness at Oceano Elementary, which is also identified by CDE as a Title I school. Because CalEnviroScreen does not separately score PM10, its overall score does not fully reflect the air-quality burden affecting this community. These socioeconomic indicators coincide with documented environmental concerns, including impaired-water conditions and exposure to coarse particulate matter, supporting a DAC designation.⁷

⁵ California Department of Education, 2024–25 School Accountability Report Cards for Oceano Elementary, Nipomo Elementary, Lillian Larsen Elementary, and Shandon Elementary; see also CDE, CALPADS SLO County Homeless Student Enrollment information. [Oceano Elementary SARC](#); [Nipomo Elementary SARC](#); [Lillian Larsen Elementary SARC](#); [Shandon Elementary SARC](#); [CDE SLO County Homeless Student Enrollment Information](#)

⁶ California Department of Education, *Recipients of Title I, Part A School Allocations—Fiscal Year 2025–26*; see also CDE, *Title I, Part A School Allocations*. CDE explains that Title I school allocations are based on students from low-income families and eligible school attendance areas or schools. [CDE Title I School Allocations Criteria](#); [FY 2025–26 Title I Recipient Data \(XLSX\)](#)

⁷ OEHHA, *CalEnviroScreen 5.0 Results and CalEnviroScreen 5.0 Technical Report* (July 2026); San Luis Obispo County Air Pollution Control District, *2025 Annual Air Quality Report*. CalEnviroScreen 5.0 includes a PM2.5 indicator but does not separately score PM10. [OEHHA PM2.5 Indicator](#); [CalEnviroScreen 5.0 Maps & Data](#); [SLO County APCD Air Quality Reports](#)

Census Tract 100.16. San Miguel is a small rural community surrounded by agricultural land. San Miguel Joint Union School District administrative records indicate substantial socioeconomic disadvantage among students in the community, and Lillian Larsen Elementary is identified as a Title I school. CalEnviroScreen 5.0 also identifies a substantial drinking-water contaminant burden in Tract 100.16. The convergence of socioeconomic and drinking-water evidence, together with uncertainty in the tract-level socioeconomic estimates, supports DAC designation.⁸

Census Tracts 103.01 and 103.03. Shandon is a small community situated within an expansive rural and agricultural area. Shandon Joint Unified School District administrative records indicate substantial socioeconomic disadvantage among students in the community, and Shandon Elementary is identified as a Title I school. Considered alongside tract-wide socioeconomic estimates, these local administrative data provide additional evidence of concentrated socioeconomic disadvantage and support DAC designation.⁹

Census Tracts 124.03–124.06, inclusive. The Nipomo town and surrounding area includes an older town core, some subdivisions, rural residential development, and agricultural areas. Lucia Mar Unified School District administrative records indicate substantial socioeconomic disadvantage among students at Nipomo Elementary. CDE identifies this school as a Title I school, demonstrating that concentrated disadvantage exists within the community and may be diluted when conditions are measured across broader economically varied census geography. In addition, CalEnviroScreen's drinking-water indicator provides additional evidence of environmental burden in this area, further supporting DAC designation.¹⁰

Census Tract 123.06. The County's request for DAC designation of Tract 123.06 in the Nipomo Mesa rests primarily on environmental evidence. The Nipomo Mesa has a well-documented history of PM10 impacts, and CalEnviroScreen identifies significant drinking-water and impaired-water burdens in the area. Because coarse particulate matter is not separately scored by CalEnviroScreen, an important component of the community's documented environmental burden is not directly reflected in its overall score. Available regulatory

⁸ OEHHA, *CalEnviroScreen 5.0 Results* (July 2026), Census Tract 100.16, including Drinking Water Contaminants indicator. [CalEnviroScreen 5.0 Maps & Data](#)

⁹ California Department of Education, *Shandon Elementary 2024–25 School Accountability Report Card*; California Department of Education, *Recipients of Title I, Part A School Allocations—Fiscal Year 2025–26*. [Shandon Elementary SARC](#); [CDE FY 2025–26 Title I Recipient Data](#)

¹⁰ OEHHA, *CalEnviroScreen 5.0 Results* (July 2026), Census Tracts 124.03–124.06, including Drinking Water Contaminants indicator. [CalEnviroScreen 5.0 Maps & Data](#)

records show that these are not merely modeled or anecdotal concerns, and accordingly support a DAC designation.¹¹

Requested Action

The County respectfully requests that CalEPA exercise its authority under Health and Safety Code section 39711(a) to add Census Tracts 122.01, 122.02, 100.16, 103.01, 103.03, 124.03, 124.04, 124.05, 124.06, and 123.06 to the Final 2026 DAC Designation.

The 25-percent threshold is not a statutory limit.¹² Section 39711(a) directs CalEPA to consider geographic, socioeconomic, public health, and environmental hazard criteria. The Preliminary 2026 Designation recognizes the agency's broad discretion in determining how those criteria are applied. We urge the identified census tracts be added to the Final 2026 DAC Designation.

Thank you for considering the County's comments and request.

Sincerely,



Jimmy Paulding

Chair of the Board

District 4 Supervisor

San Luis Obispo County Board of Supervisors

¹¹ OEHA, *CalEnviroScreen 5.0 Results* (July 2026), Census Tract 123.06; San Luis Obispo County Air Pollution Control District, *2025 Annual Air Quality Report*; Central Coast Regional Water Quality Control Board, *Water Quality Report Card: Nitrate in Oso Flaco Creek* (Oct. 2024); Central Coast Regional Water Quality Control Board, *San Luis Obispo County Domestic Well Sampling Pilot Project—Project Summary* (Oct. 2018). The Water Board specifically identifies Oso Flaco Creek and tributaries as impaired for nitrate. [CalEnviroScreen 5.0 Maps & Data](#); [SLO County APCD Air Quality Reports](#); [Oso Flaco Creek Water Quality Report](#); [Domestic Well Sampling Pilot](#)

¹² Cal. Health & Safety Code § 39711(a); California Environmental Protection Agency, *Preliminary 2026 Designation of Disadvantaged Communities Pursuant to Senate Bill 535* (July 2026), pp. 1, 7–8.